

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**JOHN DOE,**

**Plaintiff,**

**V.**

**MISSION WACO, A TEXAS NON-PROFIT ORGANIZATION, MISSION WACO WORLD CUP CAFÉ, A BUSINESS AND INDIVIDUALS OR ENTITIES ASSOCIATED WITH THE ADVERSE ACTIONS INFLUENCED BY COMMENTS AND ACTIONS DIRECTED TOWARD PLAINTIFF AFFECTING THE LEVEL OF SERVICE INSIDE OF THE CAFÉ,**

**Defendants.**

**Civil Action No. 6:24-cv-00600-ADA-JCM**

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO RESPOND TO PLAINTIFF’S FIRST AMENDED COMPLAINT**

Defendant Mission Waco, Mission World, Inc.<sup>1</sup> files this Unopposed Motion for Extension of Time to Respond to Plaintiff's First Amended Complaint, and in support thereof, respectfully shows the Court as follows:

1. On January 13, 2025, Plaintiff filed his Motion for Leave to File Amended Complaint. (ECF 14).
2. On January 21, 2025, Defendant notified the Court that it would not oppose Plaintiff's Motion for Leave to File Amended Complaint. As a result, the Court ordered the Clerk

<sup>1</sup> Defendant Mission Waco, Mission World, Inc. is improperly named as two defendants in pro se Plaintiff's pleadings as "Misson Waco, a Texas Non-Profit Organization" and "Mission Waco World Cup Café, a Business."

of Court to file Plaintiff's First Amended Complaint ("Complaint") as of January 21, 2025. (ECF 20). Defendant's response to the First Amended Complaint is currently due on February 4, 2025.

3. Defendant is in need of additional time to review and respond to the allegations in Plaintiff's Complaint. Defendant requests a two-week extension of time until and including February 18, 2025, to answer or otherwise respond to the Complaint.

4. This extension is not sought for purposes of delay. Rather the extension is sought so that Defendant has adequate time to prepare its response and defenses to the Complaint.

WHEREFORE, Defendant respectfully requests that this Court grant this Motion, extend the time for Defendant to answer or otherwise respond to Plaintiff's First Amended Complaint, and grant such further relief as the Court deems just and proper.

DATED: January 23, 2025

Respectfully submitted,

By: /s/ Paul E. Hash

Paul E. Hash

Texas Bar No. 09198020

Paul.Hash@jacksonlewis.com

Nicholé M. Plagens

State Bar No. 24083665

Nichole.Plagens@jacksonlewis.com

JACKSON LEWIS P.C.

500 N. Akard, Suite 2500

Dallas, Texas 75201

Phone: (214) 520-2400

Facsimile: (214) 520-2008

**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF CONFERENCE**

On January 23-24, 2025, Defendant's counsel conferred with pro se Plaintiff regarding the relief sought. Pro se Plaintiff stated that Plaintiff does not oppose the requested extension of time.

/s/ Paul E. Hash

Paul E. Hash

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24th day of January 2025, a copy of the foregoing pleading was served upon pro se Plaintiff via U.S. Mail and Certified Mail RRR.

/s/ Paul E. Hash

Paul E. Hash